

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## APPENDIX 4

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Brooks, Jay Mingnon	11/25/2014	10:22-11:6			
Brooks, Jay Mingnon	11/25/2014	11:14-14:5			
Brooks, Jay Mingnon	11/25/2014	15:1-20:15			
Brooks, Jay Mingnon	11/25/2014	37:10-40:14	FRE 401 - working group re: 2011 PBNDS implementation not relevant	176:6-178:13	<b>RESPONSE TO OBJ.:</b> Relevant to implimentation of the standards governing phone system.
Brooks, Jay Mingnon	11/25/2014	49:3-52:11			
Brooks, Jay Mingnon	11/25/2014	52:15-54:11			
Brooks, Jay Mingnon	11/25/2014	74:3-74:14			
Brooks, Jay Mingnon	11/25/2014	89:17-90:9			
Brooks, Jay Mingnon	11/25/2014	93:19-94:7			
Brooks, Jay Mingnon	11/25/2014	102:19-104:22		176:6-178:13	FRCP 32(a)(6) - Outside of the scope of the designation
Brooks, Jay Mingnon	11/25/2014	106:14-107:19			
Brooks, Jay Mingnon	11/25/2014	108:10-109:6		109:7-110:16	
Brooks, Jay Mingnon	11/25/2014	110:20-111:17			
Brooks, Jay Mingnon	11/25/2014	115:12-116:4		116:5-117:12; 121:3-122:16	
Brooks, Jay Mingnon	11/25/2014	118:20-22			
Brooks, Jay Mingnon	11/25/2014	122:17-123:3			
Brooks, Jay Mingnon	11/25/2014	136:5-8			
Brooks, Jay Mingnon	11/25/2014	165:8-22		176:6-178:13	FRCP 32(a)(6) - Outside of the scope of the designation
Brooks, Jay Mingnon	11/25/2014	181:11-182:11			
Brooks, Jay Mingnon	11/25/2014	184:14-185:17			
Brooks, Jay Mingnon	11/25/2014	186:22-187:4			
Brooks, Jay Mingnon	11/25/2014	189:17-191:8		191:9-192:16	Propose 189:17-193:18, which encompasses both.
Brooks, Jay Mingnon	11/25/2014	192:17-193:18			
Brooks, Jay Mingnon	11/25/2014	204:22-206:10			
Brooks, Jay Mingnon	11/25/2014	206:14-207:5			
Dozoretz, Nina	11/20/2014	8:4-22:21		23:6-14, 23:21-24:7; 106:19-107:22; 160:2-6; 197:22-198:9; 207:22-208:21	FRCP 32(a)(6) - Outside of the scope of the designation. The original designation simply identifies the 30(b)(6) topics for which the witness was designated to testify. The counter-designations are not properly within the scope of the designation simply because they relate to one of the 30(b)(6) topics.
Dozoretz, Nina	11/20/2014	24:19-25:13			
Dozoretz, Nina	11/20/2014	28:10-29:9		73:20-74:17	FRCP 32(a)(6) - Outside of the scope of the designation.
Dozoretz, Nina	11/20/2014	29:13-30:8	Foundation objection at 29:15; Beyond scope of testimony		Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity; Deponent testified regarding knowledge and awareness of differences in question; Testimony falls within scope of 30(b)(6) topics; defendant has no standing to raise this objection and/or was waived by testimony at deposition.
Dozoretz, Nina	11/20/2014	37:19-38:16			
Dozoretz, Nina	11/20/2014	38:18-42:5			
Dozoretz, Nina	11/20/2014	49:1-21			

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Dozoretz, Nina	11/20/2014	60:1-63:18			
Dozoretz, Nina	11/20/2014	70:10-72:21		130:12-133:1; 150:2-22; 183:4-8	130:12-133:1; 150:2-22 - FRCP 32(a)(6) - Outside of the scope of the designation.
Dozoretz, Nina	11/20/2014	75:6-11			
Dozoretz, Nina	11/20/2014	79:1-82:8			
Dozoretz, Nina	11/20/2014	82:12-85:14			
Dozoretz, Nina	11/20/2014	89:11-90:14			
Dozoretz, Nina	11/20/2014	91:5-94:22			
Dozoretz, Nina	11/20/2014	101:10-16		101:17-104:3	
Dozoretz, Nina	11/20/2014	114:10-115:22		119:12-22	FRE 203 - incomplete designation (question and part of answer omitted); misleading
Dozoretz, Nina	11/20/2014	119:13-120:17			
Dozoretz, Nina	11/20/2014	120:19-125:8			
Dozoretz, Nina	11/20/2014	133:22-136:16			
Dozoretz, Nina	11/20/2014	144:21-148:3			
Dozoretz, Nina	11/20/2014	152:12-16			
Dozoretz, Nina	11/20/2014	155:5-159:18			
Dozoretz, Nina	11/20/2014	165:3-18	This designation stops mid testimony	165:19-166:6	
Dozoretz, Nina	11/20/2014	166:7-17		166:18-22	
Dozoretz, Nina	11/20/2014	169:9-170:12			
Dozoretz, Nina	11/20/2014	175:20-176:21			
Dozoretz, Nina	11/20/2014	181:1-11			
Dozoretz, Nina	11/20/2014	201:20-204:3		204:4-21; 193:5-21	
Dozoretz, Nina	11/20/2014	227:8-228:12			
Fishburn, Dana	6/9/2015	35:1-11			
Fishburn, Dana	6/9/2015	63:24-64:4		64:5-24	
Fishburn, Dana	6/9/2015	68:21-69:4		69:5-71:13	Propose 68:21-71:19, which encompasses both.
Fishburn, Dana	6/9/2015	73:17-74:8			
Fishburn, Dana	6/9/2015	86:9-89:11		85:25-86:8; 135:3-136:9	
Fishburn, Dana	6/9/2015	93:19-98:8		98:9-21; 135:3-136:9	
Fishburn, Dana	6/9/2015	103:21-105:1		135:3-136:9	
Fishburn, Dana	6/9/2015	105:17-106:6		105:11-16	
Fishburn, Dana	6/9/2015	108:8-19			
Fishburn, Dana	6/9/2015	110:16-20			
Fishburn, Dana	6/9/2015	116:17-22			
Fishburn, Dana	6/9/2015	119:19-25			
Fishburn, Dana	6/9/2015	125:24-126:5			
Fishburn, Dana	6/9/2015	128:7-13			
Gonzalez, Eric	8/19/2015	1:1-25			
Gonzalez, Eric	8/19/2015	7:1-22			
Gonzalez, Eric	8/19/2015	15:12-19:13			
Gonzalez, Eric	8/19/2015	19:20-20:12			
Gonzalez, Eric	8/19/2015	20:21-21:15			
Gonzalez, Eric	8/19/2015	21:18-24			
Gonzalez, Eric	8/19/2015	22:6-15			
Gonzalez, Eric	8/19/2015	22:25-24:4			
Gonzalez, Eric	8/19/2015	24:17-25:5			
Gonzalez, Eric	8/19/2015	25:19-24			
Gonzalez, Eric	8/19/2015	39:7-40:22			
Gonzalez, Eric	8/19/2015	50:2-10			
Gonzalez, Eric	8/19/2015	60:11-62:25	Irrelevant (FRE 401/403)		Relevant to availability of phone features and feasibility of implementing changes.
Gonzalez, Eric	8/19/2015	63:23-64:6			
Gonzalez, Eric	8/19/2015	64:18-20			
Gonzalez, Eric	8/19/2015	64:24-65:12			
Gonzalez, Eric	8/19/2015	65:20-66:7			

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Gonzalez, Eric	8/19/2015	76:16-21			
Gonzalez, Eric	8/19/2015	83:18-22	Foundation		Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Gonzalez, Eric	8/19/2015	84:12-24			
Gonzalez, Eric	8/19/2015	85:11-17			
Gonzalez, Eric	8/19/2015	87:3-10			
Gonzalez, Eric	8/19/2015	104:24-105:3	Irrelevant (FRE 401/403); lack of personal knowledge (FRE 602)		Relevant to determining phone rates for detainee calls. Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Gonzalez, Eric	8/19/2015	105:7-15	Irrelevant (FRE 401/403); lack of personal knowledge (FRE 602)		Relevant to determining phone rates for detainee calls. Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Gonzalez, Eric	8/19/2015	105:17-106:4	Irrelevant (FRE 401/403)		Relevant to determining phone rates for detainee calls
Gonzalez, Eric	8/19/2015	119:9-120:3	Irrelevant (FRE 401/403)		Relevant to phone systems and operations at facility
Gonzalez, Eric	8/19/2015	120:9-10	Irrelevant (FRE 401/403)		Relevant to phone systems and operations at facility
Gonzalez, Eric	8/19/2015	122:5-8	Irrelevant (FRE 401/403)		Relevant to phone systems and operations at facility
Gonzalez, Eric	8/19/2015	123:3-13			
Gonzalez, Eric	8/19/2015	123:22-124:7			
Gonzalez, Eric	8/19/2015	127:14-20	Irrelevant (FRE 401/403)		Relevant to understanding what is offered to class member detainees with disabilities
Gonzalez, Eric	8/19/2015	127:22	Irrelevant (FRE 401/403)		Relevant to understanding what is offered to class member detainees with disabilities
Gonzalez, Eric	8/19/2015	128:5-20			
Gonzalez, Eric	8/19/2015	130:25-131:25			
Gonzalez, Eric	8/19/2015	132:2-133:24			
Gonzalez, Eric	8/19/2015	134:1-7			
Gonzalez, Eric	8/19/2015	135:9-10			
Gonzalez, Eric	8/19/2015	135:14-17			
Gonzalez, Eric	8/19/2015	135:18-137:9		137:14-138:6	
Gonzalez, Eric	8/19/2015	139:4-6			
Gonzalez, Eric	8/19/2015	139:11-20			
Gonzalez, Eric	8/19/2015	141:4-14		285:2-19	
Gonzalez, Eric	8/19/2015	147:19-149:10	Irrelevant (FRE 401/403); lack of personal knowledge (FRE 602); outside scope of 30(b)(6) deposition		Relevant to the provision of phone services and payment for phone services/rates and commissions; Deponent has personal knowledge about the relationship between GTL and Praeses; testimony falls within scope of 30(b)(6) topics; defendant has no standing to raise this objection and/or was waived by testimony at deposition

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Gonzalez, Eric	8/19/2015	149:20-21	Lack of personal knowledge (FRE 602); outside scope of 30(b)(6) deposition		Deponent has personal knowledge about the relationship between GTL and Praeses; testimony falls within scope of 30(b)(6) topics; defendant has no standing to raise this objection and/or was waived by testimony at deposition.
Gonzalez, Eric	8/19/2015	149:23	Outside scope of 30(b)(6) deposition		Testimony falls within scope of 30(b)(6) topics; defendant has no standing to raise this objection and/or was waived by testimony at deposition.
Gonzalez, Eric	8/19/2015	150:1-9	Outside scope of 30(b)(6) deposition		Testimony falls within scope of 30(b)(6) topics; defendant has no standing to raise this objection and/or was waived by testimony at deposition.
Gonzalez, Eric	8/19/2015	156:18-157:6			
Gonzalez, Eric	8/19/2015	158:4-159:24	Irrelevant (FRE 401/403)		Relevant to factors behind phone rates at Facility.
Gonzalez, Eric	8/19/2015	165:1-18	Irrelevant (FRE 401/403); lack of personal knowledge (FRE 602)		Relevant to showing what types of fees may apply and whether they are necessary or not to the provision of phone service; Witness is familiar with negotiating process for fees and was testifying as 30(b)(6) on behalf of company and not in personal capacity
Gonzalez, Eric	8/19/2015	169:21-170:9		169:8-18	
Gonzalez, Eric	8/19/2015	172:18-173:15		172:8-17; 286:9-21	FRCP 32(a)(6) - Outside of the scope of the designation.
Gonzalez, Eric	8/19/2015	173:18-174:8	Lack of personal knowledge (FRE 602)	286:9-21	<b>RESPONSE TO OBJ.:</b> Witness was testifying as 30(b)(6) on behalf of company and not in individual capacity;  FRCP 32(a)(6) - Outside of the scope of the designation.
Gonzalez, Eric	8/19/2015	179:7-25		178:5-179:1	
Gonzalez, Eric	8/19/2015	180:3-181:17	Irrelevant (FRE 401/403) after 180:8		Relevant to high phone rates at facility
Gonzalez, Eric	8/19/2015	182:8-183:22	Irrelevant (FRE 401/403)		Relevant to high phone rates at facility
Gonzalez, Eric	8/19/2015	187:8-188:8			
Gonzalez, Eric	8/19/2015	192:1-16			
Gonzalez, Eric	8/19/2015	192:21-193:12	Lack of personal knowlede (FRE 602); Irrelevant (FRE 401/403)		Relevant to high phone rates at facility; Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Gonzalez, Eric	8/19/2015	198:6-199:22			
Gonzalez, Eric	8/19/2015	200:10-12			
Gonzalez, Eric	8/19/2015	210:3-211:15			
Gonzalez, Eric	8/19/2015	212:1-14			

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Gonzalez, Eric	8/19/2015	219:1-220:15	Irrelevant (FRE 401/403); hearsay (FRE 802)		Relevant to showing alternative features available; Testimony relates to negotiating process and is not offered to prove truth of the matter asserted
Gonzalez, Eric	8/19/2015	224:4-9	Irrelevant (FRE 401/403)		Relevant to showing alternative features available, and how RFPs are negotiated, which affects pricing/rates/commissions
Gonzalez, Eric	8/19/2015	224:22-226:19	Irrelevant (FRE 401/403)		Relevant to showing alternative features available, and how RFPs are negotiated, which affects pricing/rates/commissions
Gonzalez, Eric	8/19/2015	237:14-24			
Gonzalez, Eric	8/19/2015	249:15-253:12			
Gonzalez, Eric	8/19/2015	265:19-266:5	Hearsay (FRE 802); lack of personal knowledge (FRE 602)		Not introduced to prove truth of the matter asserted; Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Gonzalez, Eric	8/19/2015	267:3-268:24			
Gonzalez, Eric	8/19/2015	269:21-270:18			
Gonzalez, Eric	8/19/2015	271:1-8			
Gonzalez, Eric	8/19/2015	277:8-278:3			
Gonzalez, Eric	8/19/2015	278:7-279:2	Lack of personal knowlesge (FRE 602)		Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Gonzalez, Eric	8/19/2015	279:24-280:4			
Gonzalez, Eric	8/19/2015	280:22-281:5			
Gonzalez, Eric	8/19/2015	288:1-289:25			
Gonzalez, Eric	8/19/2015	284:22-285:1			
Halls, Roberta	12/2/2014	9:3-11:15			
Halls, Roberta	12/2/2014	13:4-16:18	Irrelevant (FRE 401/403)		Relevant to establish foundation as an ICE employee familiar with phone access policies
Halls, Roberta	12/2/2014	17:5-10	Foundation		Witness was familiar with the document and established foundation
Halls, Roberta	12/2/2014	18:22-19:11			
Halls, Roberta	12/2/2014	20:20-21:5			
Halls, Roberta	12/2/2014	23:1-24:3			
Halls, Roberta	12/2/2014	26:22-27:3			
Halls, Roberta	12/2/2014	29:9-14			
Halls, Roberta	12/2/2014	29:24-30:7			
Halls, Roberta	12/2/2014	34:16-35:2			
Halls, Roberta	12/2/2014	35:15-21			
Halls, Roberta	12/2/2014	42:8-16			
Halls, Roberta	12/2/2014	46:23-47:4			
Halls, Roberta	12/2/2014	49:16-51:10	Irrelevant (FRE 401/403)		Relevant to potential phone options
Halls, Roberta	12/2/2014	51:20-52:1			
Halls, Roberta	12/2/2014	55:22-56:9			
Halls, Roberta	12/2/2014	56:10-56:24	Irrelevant (FRE 401/403)		Relevant to potential phone options
Halls, Roberta	12/2/2014	59:15-19			

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Halls, Roberta	12/2/2014	67:24-68:4			
Halls, Roberta	12/2/2014	75:1-76:23	Irrelevant (FRE 401/403)	74:7-13	Relevant to potential phone options
Halls, Roberta	12/2/2014	78:13-19	Foundation		Witness was familiar with the document and established foundation
Halls, Roberta	12/2/2014	81:22-23	Irrelevant (FRE 401/403)		Relevant to potential phone options
Halls, Roberta	12/2/2014	84:7-85:6	Foundation; Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities; Witness testified as to familiarity with document; Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Halls, Roberta	12/2/2014	85:20-24	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Halls, Roberta	12/2/2014	85:25-86:6	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Halls, Roberta	12/2/2014	86:17-87:4	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Halls, Roberta	12/2/2014	87:20-89:1	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Halls, Roberta	12/2/2014	90:19-91:14			
Halls, Roberta	12/2/2014	92:2-6			
Halls, Roberta	12/2/2014	96:22-97:14			
Halls, Roberta	12/2/2014	105:23-106:15			
J.H.	3/23/2016	6:6-8	Relevance	27:12-19	Waived objection by not asserting at deposition, as per agreement between counsel. Relevant to show witness's lack of legal education; 27:20-28:3 should also be designated for completeness.
J.H.	3/23/2016	6:19-7:7		7:11-13	
J.H.	3/23/2016	7:14-25		7:11-13	
J.H.	3/23/2016	8:16-18			
J.H.	3/23/2016	8:23-9:8		9:9-19; 10:12-17, 80:11-81:5, 81:14-15, 84:16-85:4, 85:12-86:16, Ex. 337, 87:2-5	Foundation objection for 86:7-8 (see objection at 86:9-10) and 86:12-14, 16-17 (see objection at 86:15, 86:18-23)
J.H.	3/23/2016	9:20-10:1		9:9-19; 10:12-17, 80:11-81:5, 81:14-15, 84:16-85:4, 85:12-86:16, Ex. 337, 87:2-5	Foundation objection for 86:7-8 (see objection at 86:9-10) and 86:12-14, 16-17 (see objection at 86:15, 86:18-23)
J.H.	3/23/2016	11:3-7		11:8-21, 102:21-103:25, 104:5-104:11	104:12-16 designated for completeness.
J.H.	3/23/2016	11:22-12:8		102:21-103:25, 104:5-104:11	104:12-16 designated for completeness.
J.H.	3/23/2016	12:15-13:2		13:3-5, 72:10-24, 73:12-14, 74:1-76:7, 77:4-11	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12).
J.H.	3/23/2016	13:6-20			
J.H.	3/23/2016	14:2-12	Leading	13:21-24	Waived objection by not asserting at deposition. Not leading.

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
J.H.	3/23/2016	14:24-15:15		98:24-99:14, 60:25-61:18, 94:21-95:8, 35:20-25, 92:18-22	
J.H.	3/23/2016	16:1-25		17:1-6, 71:15-73:14, 74:1-76:7, 77:4-11, 11:24-113:8, 113:14-114:8, 20:7-15	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12).
J.H.	3/23/2016	17:25-18:20		17:1-6, 71:15-73:14, 74:1-76:7, 77:4-11, 11:24-113:8, 113:14-114:8, 105:12-23, 106:15-107:5, 20:7-15	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12); 108:16-22 as redirect testimony.
J.H.	3/23/2016	19:2-7		105:12-23, 106:15-107:5	108:16-22 as redirect testimony.
J.H.	3/23/2016	22:10-20		98:24-99:14, 60:25-61:18, 94:21-95:8, 35:20-25, 59:6-14, 92:18-22	
J.H.	3/23/2016	23:2-3, 6-8 (starting at "Because my...)	Speculation, witness lacks personal knowledge	23:4-5, 98:24-99:14, 60:25-61:18, 94:21-95:8	Foundation established at 98:24-99:24 (describing being able to reach criminal lawyer offices from the law library phone, but not the housing unit phone).
J.H.	3/23/2016	23:10-18		23:19-24, 71:15-73:14, 89:24-91:21, 12:9-14	23:25-24:10 designated for completeness.
J.H.	3/23/2016	24:8-10	Relevance		Waived objection by not asserting at deposition, as per agreement between counsel. Relevant to show ties to country.
J.H.	3/23/2016	24:21-25:9		25:12-20, 100:21-101:20, 101:24-102:11, 102:17-21, 126:9-127:10	25:21-26:1 designated for completeness.
J.H.	3/23/2016	27:2-8		26:18-23; 27:9-19, 72:10-24, 73:12-14, 74:1-76:7, 77:4-11	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12); 26:24-27:1 and 27:20-28:3 designated for completeness.
J.H.	3/23/2016	28:4-12	Speculation, witness lacks personal knowledge	28:13-14, 98:24-99:14, 60:25-61:18, 94:21-95:8, 35:20-25, 92:18-22	Foundation for personal knowledge established at 98:24-99:24 (describing being able to reach criminal lawyer offices from the law library phone, but not the housing unit phone).
J.H.	3/23/2016	28:19-29:7		28:16-18, 102:21-103:25, 104:5-11	104:12-16 designated for completeness.
J.H.	3/23/2016	29:20-30:6			
J.H.	3/23/2016	30:22-31:15		102:21-103:25, 104:5-11	104:12-16 designated for completeness.
J.H.	3/23/2016	31:20-23		31:24-32:4, 102:21-103:25, 104:5-11	104:12-16 designated for completeness.
J.H.	3/23/2016	32:5-33:14		71:15-73:14, 74:1-76:7, 77:4-11, 111:24-113:8, 113:14-114:8, 106:15-107:5, 89:24-91:21, 12:9-14, 39:18-20, 122:23-123:19	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12); Foundation objection for 90:14-15 (see objection at 90:16) ; 39:21-24 should be designated for completeness; 108:16-19 designated as redirect testimony.
J.H.	3/23/2016	34:5-17			
J.H.	3/23/2016	34:22-25			



**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
J.H.	3/23/2016	35:5-12		35:1-4, 35:20-25	
J.H.	3/23/2016	36:1-37:7		35:20-25, 13:3-5, 72:10-24, 73:12-14, 74:1-76:7, 77:4-11, 102:21-103:25, 104:5-104:11	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12); 104:12-16 designated for completeness.
J.H.	3/23/2016	38:3-5		38:6-10; 39:18-20, 109:13-22, 115:3-5, 115:20-22, 116:6-117:24	39:21-24 and 115:23-116:1 designated for completeness.
J.H.	3/23/2016	38:14-17		38:6-10; 39:18-20, 109:13-22, 115:3-5, 115:20-22, 116:6-117:24	39:21-24 and 115:23-116:1 designated for completeness.
J.H.	3/23/2016	39:4-13		38:6-10; 39:18-20, 109:13-22, 115:3-5, 115:20-22, 116:6-117:24, 111:24-113:8, 113:14-114:8	39:21-24 and 115:23-116:1 designated for completeness.
J.H.	3/23/2016	39:25-40:21		38:6-10; 39:18-20, 109:13-22, 115:3-5, 115:20-22, 116:6-117:24	39:21-24 and 115:23-116:1 designated for completeness.
J.H.	3/23/2016	41:22-42:14		60:25-61:18, 12:9-14, 89:24-91:21	Foundation objection for 90:14-15 (see objection at 90:16).
J.H.	3/23/2016	43:12-22		42:15-43:9; 44:6-10, 119:12-120:13, Ex. 338, 120:23-122:11, Ex. 339, 129:19-130:4, 122:23-123:19	43:10-11 and 120:14-22 should also be included for completeness
J.H.	3/23/2016	44:11-25		42:15-43:9; 44:6-10, 119:12-120:13, Ex. 338, 120:23-122:11, Ex. 339, 129:19-130:4, 122:23-123:19	43:10-11 and 120:14-22 for completeness
J.H.	3/23/2016	45:3-15 (starting at "How many")		42:15-43:9; 44:6-10, 119:12-120:13, Ex. 338, 120:23-122:11, Ex. 339, 129:19-130:4, 122:23-123:19	43:10-11 and 120:14-22 for completeness
J.H.	3/23/2016	45:24-48:12 (starting at "what is the")		27:12-19; 43:3-9; 44:6-10, 119:12-120:13, Ex. 338, 120:23-122:11, Ex. 339, 129:19-130:4, 122:23-123:19, 72:10-24, 73:12-14, 74:1-76:7, 77:4-11, 100:21-101:20, 101:24-102:11, 102:17-20	27:20-28:3, 43:10-11, 120:14-22 for completeness; Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12); 101:21-23 should also be designated for completeness.
J.H.	3/23/2016	48:20-49:5		89:24-91:21, 12:9-14	Foundation objection for 90:14-15 (see objection at 90:16).
J.H.	3/23/2016	49:11-50:2		111:24-113:8, 113:14-114:8	
J.H.	3/23/2016	50:11-51:24		111:24-113:8, 113:14-114:8, 39:18-20, 109:13-22, 115:3-15, 115:20-22, 116:6-117:24, 52:3-10, 123:24-125:6	39:21-24, 115:16-19, and 115:23-116:1 designated for completeness
J.H.	3/23/2016	52:3-10			
J.H.	3/23/2016	52:14-23		52:3-10, 123:24-125:6	
J.H.	3/23/2016	53:5-54:3	Speculation, witness lacks personal knowledge	123:24-125:6	Foundation established at 53:25-54:3.
J.H.	3/23/2016	54:23-55:16			
J.H.	3/23/2016	56:5-7	Relevance	62:3-13	Waived objection by not asserting at deposition, as per agreement between counsel. Relevant regarding any assertions by Defendants regarding security risks of permitting detainees to dial telephone themselves.

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
J.H.	3/23/2016	57:7-58:20		58:21-59:2, 60:25-61:18	59:3-5 designated for completeness.
J.H.	3/23/2016	60:2-6		105:12-23, 106:15-107:5	108:16-22 designated as redirect testimony.
J.H.	3/23/2016	60:13-24		105:12-23, 106:15-107:5	108:16-22 designated as redirect testimony.
J.H.	3/23/2016	62:14-22	Speculation, witness lacks personal knowledge	62:23-63:3, 123:24-125:6	Waived objection by not asserting at deposition, as per agreement between counsel. Foundation established at 123:24-124-5.
J.H.	3/23/2016	63:4-17		119:12-120:13, Ex. 338, 120:23-122:11, Ex. 339, 129:19-130:4, 122:23-123:19, 42:15-43:9, 44:6-10	120:14-22 and 43:10-11 designated for completeness.
J.H.	3/23/2016	63:24-64:9		119:12-120:13, Ex. 338, 120:23-122:11, Ex. 339, 129:19-130:4, 122:23-123:19, 42:15-43:9, 44:6-10	120:14-22 and 43:10-11 designated for completeness.
J.H.	3/23/2016	64:16-65:24		65:25-66:5, 71:15-73:14, 74:1-76:7, 77:4-11, 12:9-14, 89:24-91:21	Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12); Foundation objection for 90:14-15 (see objection at 90:16).
J.H.	3/23/2016	70:1-4	Relevance		Waived objection by not asserting at deposition, as per agreement between counsel. Relevant to due process rights and removal case against J.H.; shows ties to country.
J.H.	3/23/2016	70:10-17			
J.H.	3/23/2016	73:15-25	73:20-25 -Hearsay as to what his lawyer told him	71:15-73:14, 74:1-76:7, 77:4-11	Waived objection by not asserting at deposition, as per agreement between counsel. Not hearsay because not offered for the truth, and goes to J.H.'s state of mind in accepting plea agreement. Relevance objection for 74:17-76:7 (see objection at 76:8-77:3); Relevance objection for 77:4-11 (see objection at 77:12).
J.H.	3/23/2016	91:22-92:3		94:7-10	
J.H.	3/23/2016	92:18-93:2		93:3-8, 94:7-10, 60:25-61:18, 94:21-95:8, 35:20-25	
J.H.	3/23/2016	97:16-98:2		105:12-23, 106:15-107:5	108:16-22 designated as redirect testimony.
J.H.	3/23/2016	98:24-99:7		99:8-14	
J.H.	3/23/2016	99:15-24		99:8-14	
J.H.	3/23/2016	100:14-101:3		101:4-20, 101:24-102:11, 102:17-20	101:21-23 designated for completeness
J.H.	3/23/2016	102:12-16		101:4-20, 101:24-102:11, 102:17-20	101:21-23 designated for completeness
J.H.	3/23/2016	103:20-22, 24-25		102:21-103:19, 104:5-11	104:12-16 designated for completeness.
J.H.	3/23/2016	104:2-4		102:21-103:19, 104:5-11	104:12-16 designated for completeness.
J.H.	3/23/2016	105:12-106:5		106:15-107:5	108:16-22 designated as redirect testimony.

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
J.H.	3/23/2016	108:20-22		106:15-107:5	108:16-22 designated as redirect testimony.
J.H.	3/23/2016	109:2-12		106:15-107:5	108:16-22 designated as redirect testimony.
J.H.	3/23/2016	109:23-110:1		110:21-111:3, 111:24-113:8, 113:14-114:8	
J.H.	3/23/2016	110:12-20		110:21-111:3, 111:24-113:8	
J.H.	3/23/2016	111:4-23		110:21-111:3, 111:24-113:8, 113:14-114:8	
J.H.	3/23/2016	119:1-16 and Exh. 338		119:17-120:13	120:14-22 designated for completeness.
J.H.	3/23/2016	121:15-122:22 and Exh. 339		120:23-121:14, 122:23-123:19, 129:19-130:4, 42:15-43:9, 44:6-10	120:14-22 and 43:10-11 designated for completeness.
J.H.	3/23/2016	123:24-124:5		123:8-19, 124:6-9, 124:21-125:6	
J.H.	3/23/2016	124:10-20		123:8-19, 124:6-9, 124:21-125:6	
J.H.	3/23/2016	127:11-13		127:14-17	
J.H.	3/23/2016	127:18-129:2		126:11-127:10, 127:14-17	
J.H.	3/23/2016	130:5-7		129:19-130:4, 122:16-19, 122:23-123:19, 42:15-43:9, 44:6-10	43:10-11 designated for completeness.
Landy, Kevin	11/19/2014	11:19-13:22		95:6-14	FRE 106 Incomplete designation
Landy, Kevin	11/19/2014	8:16-11:13			
Landy, Kevin	11/19/2014	14:5-15:5			
Landy, Kevin	11/19/2014	16:3-16:8			
Landy, Kevin	11/19/2014	25:4-16			
Landy, Kevin	11/19/2014	28:4-7			
Landy, Kevin	11/19/2014	39:15-41:19			
Landy, Kevin	11/19/2014	43:10-44:4			
Landy, Kevin	11/19/2014	51:20-53:4	Irrelevant (FRE 401/403)	52:4-53:4	Relevant to phone standards at ICE facilities
Landy, Kevin	11/19/2014	53:15-54:12	Confusing (FRE 403)	54:13-18	Relevant to phone standards at ICE facilities; Witness clearly articulated testimony
Landy, Kevin	11/19/2014	57:1-12		58:4-59:1; 59:13-60:6; 60:16-61:5	FRCP 32(a)(6) - Outside of the scope of the designation.
Landy, Kevin	11/19/2014	67:12-69:15			
Landy, Kevin	11/19/2014	70:7-71:19	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Landy, Kevin	11/19/2014	79:15-20	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Landy, Kevin	11/19/2014	86:15-88:8	Irrelevant (FRE 401/403)		Relevant to phone standards at ICE facilities
Landy, Kevin	11/19/2014	98:9-102:9	Irrelevant (FRE 401/403)		Relevant to relationship between ICE and Facilities
Landy, Kevin	11/19/2014	111:18-113:8	Irrelevant (FRE 401/403)		Relevant to phone standards and rates
Landy, Kevin	11/19/2014	113:9-114:7	Irrelevant (FRE 401/403); outside scope of R. 30(b)(6) testimony - based on personal knowledge		Relevant to phone rates; 30(b)(6) witness may testify based on personal knowledge
Landy, Kevin	11/19/2014	134:1-136:12	Irrelevant (FRE 401/403); lack of personal knowledge (FRE 602)		Related to phone rates; Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Landy, Kevin	11/19/2014	136:13-137:10		137:11-138:2	FRCP 32(a)(6) - Outside of the scope of the designation.
Landy, Kevin	11/19/2014	138:16-139:6	Irrelevant (FRE 401/403)		Relevant to phone standards at facilities; Establishing foundation
Landy, Kevin	11/19/2014	139:7-139:15	Irrelevant (FRE 401/403)		Relevant to phone standards at facilities; Establishing foundation
Landy, Kevin	11/19/2014	139:16-139:22	Irrelevant (FRE 401/403)		Relevant to phone standards at facilities; Establishing foundation
Landy, Kevin	11/19/2014	140:1-141:4	Irrelevant (FRE 401/403)		Relevant to phone standards at facilities
Landy, Kevin	11/19/2014	144:6-145:8	Irrelevant (FRE 401/403)		Relevant to phone standards at facilities
Landy, Kevin	11/19/2014	146:15-148:16	Irrelevant (FRE 401/403); lack of personal knowledge (FRE 602)	150:14-22	Relevant to phone standards at facilities; Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Landy, Kevin	11/19/2014	148:17-149:16	Irrelevant (FRE 401/403)	149:17-22	Relevant to phone standards at facilities
Landy, Kevin	11/19/2014	161:21-162:8			
Landy, Kevin	11/19/2014	162:9-18	Irrelevant (FRE 401/403)		Relevant to Talton Platform and phone rates at facilities
Landy, Kevin	11/19/2014	162:19-163:13	Irrelevant (FRE 401/403)		Relevant to Talton Platform and phone rates at facilities
Landy, Kevin	11/19/2014	171:7-9			
Landy, Kevin	11/19/2014	173:22-174:4			
Landy, Kevin	11/19/2014	174:16-19			
Landy, Kevin	11/19/2014	171:18-172:14	Lack of personal knowledge (FRE 602)	181:12-22	Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Landy, Kevin	11/19/2014	179:17-181:6		175:10-176:7; 176:17-177:21	
Landy, Kevin	11/19/2014	189:9-192:2	Lack of personal knowledge (FRE 602)		Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Landy, Kevin	11/19/2014	195:3-15	Irrelevant (FRE 401/403)	195:22-196:17	Related to phone and message procedures at facilities
Landy, Kevin	11/19/2014	196:22-197:12	Irrelevant (FRE 401/403)	195:22-196:17	Related to phone and message procedures at facilities
Landy, Kevin	11/19/2014	198:17-200:10	Lack of personal knowledge (FRE 602)	201:12-16	Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Landy, Kevin	11/19/2014	206:18-207:8	Irrelevant (FRE 401/403)		Relevant to phone standards at facilities
McDaniel, Kevin	6/10/2015	6:5-7:9			
McDaniel, Kevin	6/10/2015	19:11-20:16	20:25-21:18 Relevance; 22:11-17 Vague		Relevant to phone standards at facilities; objections to the form of the question are waived unless raised during deposition

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
McDaniel, Kevin	6/10/2015	20:25-22:24	20:25-21:18 Relevance; 22:11-17 Vague		Relevant to phone standards at facilities; objections to the form of the question are waived unless raised during deposition
McDaniel, Kevin	6/10/2015	24:2-23			
McDaniel, Kevin	6/10/2015	24:24-25:6	FRE 602, Relevance		Relevant to phone standards
McDaniel, Kevin	6/10/2015	25:19-26:13	FRE 602, Relevance		25:19-26:13; Relevant to phone standards
McDaniel, Kevin	6/10/2015	27:19-31:23			
McDaniel, Kevin	6/10/2015	32:14-36:10	35:13-19 Inadmissible hearsay	38:2-14	Party admission
McDaniel, Kevin	6/10/2015	37:2-38:1	37:6-12 Inadmissible hearsay	36:23-37:1	Party admission; not offered for the truth of the matter asserted
McDaniel, Kevin	6/10/2015	39:4-44:10	41:15-18 Inadmissible hearsay; 41:24-43:6 Vague; 43:17-44:7 Mistates prior testimony		Party admission; examiner rephrased question after vagueness objection and deponent understood and answered; question does not misstate prior testimony
McDaniel, Kevin	6/10/2015	47:16-48:18			
McDaniel, Kevin	6/10/2015	59:13-62:4	59:21-60:5, 60:25-61:4, 61:17-21 Inadmissible hearsay	58:23-59:12	59:21-60:5 - Party admission regarding procedures, not hearsay; 60:25-61:4 & 61:17-21 - Offered to show fact of knowledge and frequency of complaints and not for the truth of the matter asserted
McDaniel, Kevin	6/10/2015	64:17-65:16	64:22-65:16 Inadmissible hearsay	123:3-4; 73:11-17; 105:19-106:3; 109:23-110:4	<b>RESPONSE TO OBJ.:</b> Offered to show fact of knowledge and frequency of complaints and not for the truth of the matter asserted;  105:24-106:3; 123:3-4: FRCP 32(a)(6) - Outside of the scope of the designation.
McDaniel, Kevin	6/10/2015	74:9-24			
McDaniel, Kevin	6/10/2015	75:9-76-25			
McDaniel, Kevin	6/10/2015	80:8-13			
McDaniel, Kevin	6/10/2015	81:14-87:17	81:14-82:2, 83:12-21, 85:11-14 FRE 602, Relevance; 82:3-83:11, 83:22-84:1, 84:17-86:22, 87:12-17 Relevance	73:11-17; 105:19-106:3	Relevant to phone standards at facility
McDaniel, Kevin	6/10/2015	102:7-104:2	Relevance		Relevant to phone policies and practices at facilities
McDaniel, Kevin	6/10/2015	110:9-111:10	110:9-12, 110:16-18, 111:7-10 FRE 602	73:11-17; 105:19-106:3	<b>RESPONSE TO OBJ.:</b> Offered to prove lack of knowledge;  FRCP 32(a)(6) - Outside of the scope of the designation.
McDaniel, Kevin	6/10/2015	124:5-125:6	124:5-12, 124:16-20 Inadmissible hearsay		Offered to show fact of knowledge and frequency of complaints and lack of consistent implementation of ICE procedures and not for the truth of the matter asserted
McDaniel, Kevin	6/10/2015	125:22-127:20			
McDaniel, Kevin	6/10/2015	130:2-133:7	130:2-9 Inadmissible hearsay		Offered to show fact of knowledge and frequency of complaints and not for the truth of the matter asserted

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
McDaniel, Kevin	6/10/2015	137:16-140:24	138:14-16 Inadmissible hearsay		Business records exception; public records exception; not offered for truth of matter asserted
McDaniel, Kevin	6/10/2015	144:17-146:19	144:23-145:3, 145:14-22 Inadmissible hearsay; 143:13-144:8 FRE 602		Business Records Exception; Public Records Exception; Offered to show knowledge of detainees' difficulty receiving access to phones and not for the truth of the matter asserted; fact of knowledge and frequency of complaints and not for the truth of the matter asserted; 143:13-144:8 - Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	7:8-10			
Meyer, Craig	5/21/2015	12:9-13:24			
Meyer, Craig	5/21/2015	14:08-17:19			
Meyer, Craig	5/21/2015	18:11-19:11			
Meyer, Craig	5/21/2015	21:2-5		21:13-22	
Meyer, Craig	5/21/2015	22:2-23:15		23:16-19	
Meyer, Craig	5/21/2015	27:13-2	Incomplete designation. Speculation to the extent the designation was intended to include 27:13-27:24		27:13-28:2; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	33:20-34:7	Relevance, FRE 602		Party Admission; offered to show information presented to detainees and not for truth of matter asserted; Offered to show knowledge of ICE procedures and Facilities and not for the truth of the matter asserted; Related to phone policies and practices; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	36:2-6	Relevance, FRE 602		Party Admission; offered to show information presented to detainees and not for truth of matter asserted; Offered to show knowledge of ICE procedures and Facilities and not for the truth of the matter asserted; Related to phone policies and practices; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	38:2-41:5	Relevance, FRE 602		Party Admission; offered to show information presented to detainees and not for truth of matter asserted; Offered to show knowledge of ICE procedures and Facilities and not for the truth of the matter asserted; Related to phone policies and practices; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	43:20-44:16			
Meyer, Craig	5/21/2015	44:17-23			
Meyer, Craig	5/21/2015	46:9-47:6	46:9-15 Relevance		Establishing foundation

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Meyer, Craig	5/21/2015	48:9-14			
Meyer, Craig	5/21/2015	48:15-54:5	51:9-23 Inadmissible hearsay; 52:3-53:3 Inadmissible hearsay, FRE 602		Offered to show knowledge of ICE procedures and Facilities and not for the truth of the matter asserted; Offered to show knowledge of lack of consistency implementing ICE procedures; topics of discussion with facilities, and not for the truth of the matter asserted; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	55:15-57:9	56:22-57:9 Speculation, FRE 602		Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	58:5-24	Relevance		Establishing foundation
Meyer, Craig	5/21/2015	60:4-61:11	60:22-61:11 Inadmissible hearsay		Party admission; not offered for truth of the matter asserted,
Meyer, Craig	5/21/2015	63:5-18			
Meyer, Craig	5/21/2015	66:19-68:17		86:20-87:3	
Meyer, Craig	5/21/2015	69:23-70:21	70:16-21 Relevance, FRE 602		Related to telephone policies and practices; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	73:8-10			
Meyer, Craig	5/21/2015	75:10-14			
Meyer, Craig	5/21/2015	75:15-79:8	75:21-76:10 Foundation, Standards speak for themselves; 76:11-17 FRE 602, Relevance; 76:22-77:18, 77:25-78:2. 78:8-20 Foundation, Standards speak for themselves	144:11-24; 145:3-13	<b>RESPONSE TO OBJ.:</b> Witness testimony based on personal knowledge; Related to phone standards  FRCP 32(a)(6) - Outside of the scope of the designation.
Meyer, Craig	5/21/2015	80:3-6			
Meyer, Craig	5/21/2015	80:7-83:3	80:13-20, 81:3-18, 82:4-16 FRE 602, Relevance	83:4-8	Related to phone access; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	85:15-19	FRE 602, Relevance	86:20-87:3	<b>RESPONSE TO OBJ.:</b> Related to phone access; Witness testified based on personal knowledge;  FRCP 32(a)(6) - Outside of the scope of the designation.
Meyer, Craig	5/21/2015	88:15-89:13	88:15-89:5 FRE 602, Relevance		Related to phone access; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	94:2-10		89:17-90:5; 90:16-19; 90:24-91:12; 93:13-19	89:17-90:5: speculative
Meyer, Craig	5/21/2015	95:4-7		89:17-90:5; 90:16-19; 90:24-91:12; 93:13-19	89:17-90:5: speculative
Meyer, Craig	5/21/2015	98:2-99:12		99:23-100:1	
Meyer, Craig	5/21/2015	100:2-101:17	100:2-25 Inadmissible hearsay; 100:23-25 FRE 602, Relevance; 101:8-17 FRE 602, Relevance	99:23-100:1; 89:17-90:5; 90:16-19; 90:24-91:12; 93:13-19	<b>RESPONSE TO OBJ.:</b> Offered to show knowledge of lack of consistency implementing ICE procedures and not for the truth of the matter asserted; Witness testified based on personal knowledge; Related to phone policies and practices;  89:17-90:5: speculative



**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Meyer, Craig	5/21/2015	101:18-102:14	101:18-102:1, 102:5-13 FRE 602, Relevance		Related to phone access; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	102:15-102:19			
Meyer, Craig	5/21/2015	105:17-19			
Meyer, Craig	5/21/2015	106:4-12	FRE 602, Relevance		Related to phone access; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	106:18-107:1	Objection to the extent this calls for a legal conclusion	107:2-8	Witness testified based on personal opinion regarding phone access; privacy of phones does not call for legal conclusion
Meyer, Craig	5/21/2015	108:23-109:6	109:2-6 FRE 602, Relevance		Related to phone access; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	109:19-111:11	FRE 602, Inadmissible hearsay	109:7-18; 113:13-114:9	Party admission; Offered to show knowledge and frequency of complaints and not for the truth of the matter asserted, in the alternative
Meyer, Craig	5/21/2015	113:6-12	Inadmissible hearsay	113:13-114:9	Party admission, not hearsay
Meyer, Craig	5/21/2015	114:10-21			
Meyer, Craig	5/21/2015	115:21-118:9	115:25-116:14 FRE 602, Relevance; 116:15-21 Inadmissible hearsay		Related to phone access; Witness testified based on personal knowledge; Establishing foundation; Party admission within a party admission, Offered to show lack of consistency implementing ICE procedures and not for the truth of the matter asserted, in the alternative
Meyer, Craig	5/21/2015	119:25-120:5			
Meyer, Craig	5/21/2015	122:9-125:8	FRE 602, Inadmissible hearsay		Offered to show knowledge of lack of consistency implementing ICE procedures and not for the truth of the matter asserted
Meyer, Craig	5/21/2015	125:16-128:10	125:16-127:18 FRE 602, Inadmissible hearsay; 127:22-24 FRE 602, Relevance		Offered to show knowledge of lack of consistency implementing ICE procedures and not for the truth of the matter asserted; Witness testified based on personal knowledge; Related to phone access
Meyer, Craig	5/21/2015	129:4-18	Inadmissible hearsay, FRE 602, Relevance		Party admission; Offered to show knowledge of lack of consistency implementing ICE procedures and not for the truth of the matter asserted; Witness testified based on personal knowledge; Related to phone access
Meyer, Craig	5/21/2015	130:14-133:22	131:17-133:22 Relevance	130:10-13	Related to phone access
Meyer, Craig	5/21/2015	134:19-135:5			



**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Meyer, Craig	5/21/2015	135:6-137:22	135:3-5 FRE 602, Relevance; 136:15-137:12 Inadmissible hearsay, FRE 602, Relevance	130:10-13	Related to phone access; Witness testified based on personal knowledge; Establishing foundation; Offered to show knowledge of lack of consistency implementing ICE procedures and not for the truth of the matter asserted
Meyer, Craig	5/21/2015	139:8-11	Relevance		Related to phone access
Meyer, Craig	5/21/2015	141:12-21	Relevance		Related to phone access
Meyer, Craig	5/21/2015	143:3-11	FRE 602, Relevance		Related to phone access; Witness testified based on personal knowledge
Meyer, Craig	5/21/2015	146:4-14			
Meyer, Craig	5/21/2015	146:15-149:23	FRE 602, Relevance		Related to phone rates
Meyer, Craig	5/21/2015	149:24-150:25	FRE 602, Relevance		Related to phone capabilities
Meyer, Craig	5/21/2015	151:1-152:1	151:17-152:1 Foundation		testimony establishes lack of knowledge
Meyer, Craig	5/21/2015	154:12-159:20	154:23-156:4, 156:11-20, 159:4-20 FRE 602, Relevance; 157:19-25 Foundation, Assumes facts not in evidence; 158:20-159:3 Inadmissible hearsay		Offered to show lack of knowledge; Related to phone access; Party admission , Offered to show knowledge and frequency of complaints and not for the truth of the matter asserted; objections to form of question not raised during deposition are waived
Meyer, Craig	5/21/2015	160:3-164:6	162:19-163:4 Inadmissible hearsay; 164:2-9, 163:15-164:23 FRE 602, Relevance; 164:19-23 Foundation		Party admission; Business Record, Public Records Exception; Witness testified based on personal knowledge; Related to phone access; 164:19-23 Offered to establish lack of knowledge
Meyer, Craig	5/21/2015	164:25-165:3	162:19-163:4 Inadmissible hearsay; 164:2-9, 163:15-164:23 FRE 602, Relevance; 164:19-23 Foundation		Party admission; Business Record, Public Records Exception; Witness testified based on personal knowledge; Related to phone access; 164:19-23 Offered to establish lack of knowledge
Meyer, Craig	5/21/2015	165:4-16			
Meyer, Craig	5/21/2015	166:17-25			
Meyer, Craig	5/21/2015	167:9-21	167:9-21 FRE 602, Relevance, Vague as to time		Related to phone policies and practices; Offered to establish lack of knowledge
Meyer, Craig	5/21/2015	167:22-168:25			
Meyer, Craig	5/21/2015	169:3-170:25			
Meyer, Craig	5/21/2015	172:2-12	172:2-12 Foundation		Party admission; Witness testified based on personal knowledge; Related to phone standards
Meyer, Craig	5/21/2015	178:4-8			
Meyer, Craig	5/21/2015	182:21-185:23			
Philbin, Brendan	7/30/2015	1:1-25			
Philbin, Brendan	7/30/2015	6:1-22			
Philbin, Brendan	7/30/2015	9:17-11:19			
Philbin, Brendan	7/30/2015	12:1-5		12:6-12	
Philbin, Brendan	7/30/2015	12:15-22			

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Philbin, Brendan	7/30/2015	13:1-5		13:6-17	
Philbin, Brendan	7/30/2015	13:18-22			
Philbin, Brendan	7/30/2015	14:24-15:1			
Philbin, Brendan	7/30/2015	15:13-21			
Philbin, Brendan	7/30/2015	20:16-21:12			
Philbin, Brendan	7/30/2015	22:5-15	Relevance		Establishes deponent's knowledge about bid process, provision of phone services and phone features
Philbin, Brendan	7/30/2015	26:9-24	Relevance		Establishes deponent's knowledge about bid process, provision of phone services and phone features/billing alternatives
Philbin, Brendan	7/30/2015	40:16-23	Relevance		Relevant to the provision of phone services and payment for phone services/rates and commissions.
Philbin, Brendan	7/30/2015	41:4-24	FRE 602, Relevance		Relevant to the provision of phone services and payment for phone services/rates and commissions. Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity
Philbin, Brendan	7/30/2015	43:14-44:9			
Philbin, Brendan	7/30/2015	49:17-50:7	Vague, Relevance		Objections to the form of the question waived by failure to raise during deposition; Question is not vague and was understood by witness; testimony is relevant to show feasibility/burden of making changes to phone system/features.
Philbin, Brendan	7/30/2015	51:3-52:3	51:3-4 Foundation		Defendants' objection relates to a question and not witness testimony; any objections to the form of the question were waived unless raised during deposition
Philbin, Brendan	7/30/2015	53:10-54:3			
Philbin, Brendan	7/30/2015	54:15-22			
Philbin, Brendan	7/30/2015	55:2-18			
Philbin, Brendan	7/30/2015	56:7-57:1			
Philbin, Brendan	7/30/2015	71:10-72:1			
Philbin, Brendan	7/30/2015	77:7-18			
Philbin, Brendan	7/30/2015	77:21-78:12	78:5-12 Foundation, FRE 602, Calls for speculation		Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity; objections to the form of the question were waived unless raised during deposition. Witness understood and responded based on his experience in the industry
Philbin, Brendan	7/30/2015	78:19-79:5		79:6-80:14	

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Philbin, Brendan	7/30/2015	81:10-23			
Philbin, Brendan	7/30/2015	86:14-24			
Philbin, Brendan	7/30/2015	87:1-18			
Philbin, Brendan	7/30/2015	91:4-12			
Philbin, Brendan	7/30/2015	95:20-96:18	95:20 Hearsay		Not offered for truth of the matter asserted--just providing context and a basis for the question about phone features/limitations
Philbin, Brendan	7/30/2015	96:25-97:6			
Philbin, Brendan	7/30/2015	98:4-11		99:1-5, 104:3-7	
Philbin, Brendan	7/30/2015	101:11-13			
Philbin, Brendan	7/30/2015	102:9-13			
Philbin, Brendan	7/30/2015	120:24-121:24			
Philbin, Brendan	7/30/2015	123:24-125:15	123:24-125:15 Relevance; 124:9-125:10 Foundation, FRE 602	126:8-15, 127:20-128:3, 128:14-129:6	Relevant to showing alternate forms of communication between inmates and counsel. Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity. Witness also has personal knowledge of products/services and their advantages/purposes. Counterdesignation should include 125:19-126:6 for completeness and context.
Philbin, Brendan	7/30/2015	129:8-130:24	130:3-130:24 Foundation, FRE 602, Relevance		Relevant to showing alternate forms of communication between inmates and counsel. Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity. Witness also has personal knowledge of products/services and their advantages/purposes.
Philbin, Brendan	7/30/2015	131:21-132:13			
Philbin, Brendan	7/30/2015	146:24-148:2			
Philbin, Brendan	7/30/2015	165:1-168:3			
Philbin, Brendan	7/30/2015	173:6-23			
Philbin, Brendan	7/30/2015	195:14-197:8	195:14-196:4 Foundation, Relevance; 195:25-196:4 Inadmissible hearsay, Relevance		Agreement between ICS and Sacramento County to provide inmate phone services is obviously relevant to Plaintiffs' claims; Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity. Witness signed the contract on behalf of ICS.
Philbin, Brendan	7/30/2015	201:12-25		200:18-201:10	

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Philbin, Brendan	7/30/2015	202:15-203:24	203:8-24 Foundation, FRE 602, Calls for speculation, Relevance		Witness testimony (including 202:1-14) establishes foundation. Witness was designated as 30(b)(6) and testifying on behalf of company in connection with designated topics and not in personal capacity. Testimony is relevant to phone rates at facilities; objections to form of question are waived if not raised during deposition
Philbin, Brendan	7/30/2015	204:1-22			
Philbin, Brendan	7/30/2015	209:13-18	Relevance		Relevant to discussing the phone services, functions and features that exist and that may be implemented to the extent they aren't currently implemented
Philbin, Brendan	7/30/2015	222:17-223:17			
Philbin, Brendan	7/30/2015	235:3-236:12	235:8-236:12 Relevance	208:4-8	<b>RESPONSE TO OBJ.:</b> Directly related to phone rates which are relevant to plaintiffs' allegations about commissions and financial incentives to counties being related to rates, charges and fees;  FRCP 32(a)(6) - Outside of the scope of the designation.
Philbin, Brendan	7/30/2015	237:23-238:5		238:7-14	
Philbin, Brendan	7/30/2015	238:16-239:11			
Philbin, Brendan	7/30/2015	239:13-240:10			
Philbin, Brendan	7/30/2015	240:14-24	Relevance		Relevant to discussing the phone services, functions and features that exist and that may be implemented to the extent they aren't currently implemented, and any burden associated with them
Philbin, Brendan	7/30/2015	241:1-7	Relevance		Relevant to discussing the phone services, functions and features that exist and that may be implemented to the extent they aren't currently implemented, and any burden associated with them
Philbin, Brendan	7/30/2015	242:11-243:15		243:16-21	
Philbin, Brendan	7/30/2015	246:1-247:21			
Talton, Julius	11/17/2015	9:5-10			
Talton, Julius	11/17/2015	10:9-25			
Talton, Julius	11/17/2015	11:6-12:15			
Talton, Julius	11/17/2015	13:18-14:4			
Talton, Julius	11/17/2015	15:8-17			
Talton, Julius	11/17/2015	17:13-18:18			
Talton, Julius	11/17/2015	22:19-24:11		24:12-16	
Talton, Julius	11/17/2015	38:4-39:7			

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Talton, Julius	11/17/2015	42:5-44:5		64:13-65:20; 67:23-68:19	FRCP 32(a)(6) - Outside of the scope of the designation; 64:13-65:20: speculative; 67:23-68:19 incomplete designation (FRE 106); misleading (FRE 403); improper lay opinion (FRE 701).
Talton, Julius	11/17/2015	45:2-21			
Talton, Julius	11/17/2015	62:18-23			
Talton, Julius	11/17/2015	63:11-23			
Talton, Julius	11/17/2015	86:16-90:6			
Talton, Julius	11/17/2015	112:7-113:25			
Talton, Julius	11/17/2015	114:19-22			
Talton, Julius	11/17/2015	116:19-117:23			
Talton, Julius	11/17/2015	142:2-143:7	Relevance		Cited testimony relates to in part to the operation of the free call platform
Talton, Julius	11/17/2015	180:2-183:7			
Talton, Julius	11/17/2015	187:22-190:7			
Talton, Julius	11/17/2015	193:18-194:3	Relevance		Cited testimony relates in part to operation of the free call platform, the cost of phone calls in detention, and the affect commissions have on that cost
Talton, Julius	11/17/2015	194:23-198:6	Relevance		Cited testimony relates in part to operation of the free call platform, the cost of phone calls in detention, and the affect commissions have on that cost
Talton, Julius	11/17/2015	199:5-200:11	Relevance		Cited testimony relates in part to operation of the free call platform, the cost of phone calls in detention, and the affect commissions have on that cost
Talton, Julius	11/17/2015	201:2-21	Relevance		Cited testimony relates in part to operation of the free call platform, the cost of phone calls in detention, and the affect commissions have on that cost
Talton, Julius	11/17/2015	202:13-10	Relevance		Cited testimony relates in part to operation of the free call platform, the cost of phone calls in detention, and the affect commissions have on that cost
Talton, Julius	11/17/2015	203:11-205:7	Relevance		Cited testimony relates in part to operation of the free call platform, the cost of phone calls in detention, and the affect commissions have on that cost
Talton, Julius	11/17/2015	205:19-206:21	Relevance		Cited testimony relates to in part to the cost of calls in detention, which is a fact at issue in this case
Talton, Julius	11/17/2015	207:4-208:25	Relevance		Cited testimony relates to in part to the cost of calls in detention and the state of repair of the phones
Talton, Julius	11/17/2015	210:15-213:3	Relevance		Cited testimony relates to in part to the cost of calls in detention

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Talton, Julius	11/17/2015	213:10-21	Relevance		Cited testimony relates to in part to the affect commissions have on the cost of calls in detention
Trinidad, John	6/25/2015	11:17-12:4			
Trinidad, John	6/25/2015	25:12-26:11	26:9-11:Relevance FRE 401/403 (incomplete designation; CAP Supervisor undefined; no apparent relationship to issues relevant to lawsuit)		Deponent's background is relevant to provide foundation for subsequent testimony. If testimony is incomplete, Defendants should counter-designate. Plaintiffs agree to expand designation to 26:15
Trinidad, John	6/25/2015	30:24-31:15		31:20-33:5; 35:20-36:5; 63:15-64:13; 64:24-66:8; 69:3-14	31:20-33:5: lacks foundation, speculative (FRE 602); 35:20-36:5: relevance (FRE 401/403), incomplete designation (FRE 106); 65:17-66:8, 69:3-14: FRCP 32(a)(6) - Outside of the scope of the designation, relevance (FRE401/403)
Trinidad, John	6/25/2015	33:22-34:21		31:20-33:5; 35:20-36:5; 63:15-64:13; 64:24-66:8; 69:3-14	31:20-33:5: lacks foundation, speculative (FRE 602); 35:20-36:5: relevance (FRE 401/403), incomplete designation (FRE 106); 65:17-66:8, 69:3-14: FRCP 32(a)(6) - Outside of the scope of the designation, relevance (FRE401/403)
Trinidad, John	6/25/2015	41:3-46:3	42:2: Relevance FRE 401/403 (relates to property access rather than telephone access; no apparent relationship to claims alleged); 42:3-43:19: Relevance FRE 401/403 (property access prior to class period does not relate to telephone access in detention; Foundation FRE 602 (witness lacks personal knowledge as to booking practices during time frame); 43:20-46:3: Relevance FRE 401/403 (relates to property access rather than telephone access; no apparent relationship to claims alleged)	38:17-25	41:14-42:2 - Cited testimony is relevant to access to property in order to get "phone number[s],"  42:3-43:19 - Deponent was asked "Is there a process," i.e., present-tense, and deponent testified as to present process; Witness based his testimony on personal knowledge and experience  43:20-46:3 - Cited testimony is relevant to access to property in order to get phone numbers.
Trinidad, John	6/25/2015	46:5-47:3		47:4-12	
Trinidad, John	6/25/2015	50:21-54:13	52:13-53:25: FRE 602 (goes beyond scope of witness's personal knowledge)	31:20-33:5; 35:20-36:5; 63:15-64:13; 64:24-66:8; 69:3-14	<b>RESPONSE TO OBJ.:</b> Witness testified based on personal knowledge;  31:20-33:5: lacks foundation, speculative (FRE 602), FRCP 32(a)(6) - Outside of the scope of the designation; 35:20-36:5: relevance (FRE 401/403), incomplete designation (FRE 106), FRCP 32(a)(6) - Outside of the scope of the designation; 65:17-66:8, 69:3-14: FRCP 32(a)(6) - Outside of the scope of the designation, relevance (FRE401/403)

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	54:17-55:14	Relevance FRE 401/403 (training does not have bearing on any relevant issue; unduly prejudicial)		FRE 401: The referenced training relates to "detention standards," which include phone-access standards; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims
Trinidad, John	6/25/2015	55:15-58:22	57:16-58:22: Relevance FRE 401/403 (does not have bearing on any relevant issue; unduly prejudicial)		FRE 401: The referenced training relates in part to jail operations and phone access; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims
Trinidad, John	6/25/2015	59:24-60:15	Relevance FRE 401/403 (does not have any bearing on any relevant issue; unduly prejudicial)		FRE 401: The referenced training relates in part to jail operations and phone access; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; offered to show lack of knowledge
Trinidad, John	6/25/2015	61:12-62:5	FRE 602 (lack of personal knowledge); Relvance FRE 401/403 (does not have bearing on any relevant issue; unduly prejudicial)		FRE 401: Relevant to showing deponent's knowledge of telephone access standards; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims FRE 602: deponent testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	69:24-71:8	70:10-21, 71:5-7: Relevance FRE 401/403 (no information about telephone access conditions; unduly prejudicial)		Relevant to show knowledge of jail operations and phone access; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; offered to show lack of knowledge
Trinidad, John	6/25/2015	73:7-23	73:7-16: Relevance FRE 401/403 (no information about telephone access conditions; unduly prjeudicial)		Relevant to show deponent's understanding of detainees; no basis for undue prejudice as testimony is highly relevant to Plaintiffs' claims; offered to show lack of knowledge
Trinidad, John	6/25/2015	74:8-75:14			
Trinidad, John	6/25/2015	81:24-82:13	82:9-13: FRE 602 (lack of personal knowledge/calls for speculation)	89:12-90:1	Witness testified based on personal knowledge; offered to show lack of knowledge Outside the scope of original designation

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	87:1-88:9	87:1-6: Relevance FRE 401/403 (incomplete designation/lack of context); 87:23-88:9: FRE 602/701 (lack of personal knowledge; improper lay opinion)	86:16-25; 89:12-90:1	Agree to expand designation to 86:16-88:9; FRE 401/403 - Relevant to show witness's understanding of the phones in the facility; FRE 602/701 - Witness testified based on personal knowledge; offered to show lack of knowledge 89:12-90:1: Outside the scope of original designation
Trinidad, John	6/25/2015	94:13-23	94:13-16: Relevance FRE 401/403 (incomplete designation/no indication of which housing unit phone referring to)	94:2-6	Agree to expand designation to 94:2-23; relevant to show witness's understanding of physical phone access
Trinidad, John	6/25/2015	98:3-100:10	98:3-99:10: FRE 602 (witness lacks personal knowledge regarding precise practices regarding use of phones); Relevance FRE 401/403 (incomplete designation; no explanation of housing unit) 99:14-100:2: FRE 403 (object to characterization as "such a restrictive setting"; legal argument and unduly prejudicial)	97:13-21	Witness testified based on personal knowledge; offered to show lack of knowledge; relevant to show witness's understanding of physical phone access
Trinidad, John	6/25/2015	103:9-104:1	Relevance FRE 401/403 (lacks context; no explanation of housing unit); 103:9-13: FRE 602 (witness lacks knowledge of schedule)	102:15-19; 103:5-8; 104:5-8	Agree to expand designation; relevant to show witness's understanding of physical phone access; Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	109:20-111:2	109:20-111:2: Relevance FRE 401/403 (named Plaintiffs lack standing to raise claims regarding notice to detainees who do not speak English or Spanish)	109:5-8	Relevant to show phone access and accommodation for non-English/Spanish class members Lack of foundation (FRE 602); FRCP 32(a)(6) - Outside of the scope of the designation
Trinidad, John	6/25/2015	111:3-25	111:3-21: FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)		Relevant to showing deponent's knowledge of phone capabilities and issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Witness testified based on personal knowledge; offered to show lack of knowledge
		113:2-114:2	FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)		Relevant to showing deponent's knowledge of phone capabilities and issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Deponent responded based on his personal knowledge; testimony speaks for itself



**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	117:19-119:21	119:4-21: FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)	116:7-12; 121:7-122:13	Relevant to showing deponent's knowledge of phone capabilities and issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	121:9-16	121:9-13: Relevance FRE 401/403 (witness's training on phone rooms is not relevant to claims/unduly prejudicial) 121:13-16: FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)	121:7-122:13	121:9-13: relevant to show defendants addressing phone access issues; 121:13-16: Witness testified based on personal knowledge; offered to show lack of knowledge; relevant to show understanding of phone access
Trinidad, John	6/25/2015	123:15-125:6	123:19-125:6: Relevance FRE 401/403 (named Plaintiffs lack standing to raise claims regarding notice or access to detainees who do not speak English or Spanish or who are hearing impaired). 123:15-5: FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)		123:19-25 : FRE 401/403 - Relevant to show phone access and accommodation for non-English/Spanish class members Assume this should be 123:15-25: Witness testified based on personal knowledge; offered to show lack of knowledge; relevant to show understanding of phone access in facility; no basis for undue prejudice as testimony highly relevant to Plaintiffs' claims; offered to show lack of knowledge
Trinidad, John	6/25/2015	126:7-127:16	127:2-16: FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)		Relevant to showing responses to phone access issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	127:21-131:22			
Trinidad, John	6/25/2015	132:24-133:6		133:7-15	
Trinidad, John	6/25/2015	139:15-141:7			
Trinidad, John	6/25/2015	142:3-11			
Trinidad, John	6/25/2015	143:3-146:11	Object to Ex. 102 under FRE 602/FRE 901 to extent includes forms not completed/authored by witness.		Business Records Exception; Public Records Exception; used for demonstrative purposes; no personal knowledge needed
Trinidad, John	6/25/2015	147:15-148:21	147:15-21: FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial)		Relevant to showing understanding of phone access issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Witness testified based on personal knowledge; offered to show lack of knowledge

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	153:22-156:1	153:24-154:6: Relevance 401 (attorney colloquy)		Included for ease of designation. Standalone designation to 153:22-23 and 154:7-156:1 is not as clear
Trinidad, John	6/25/2015	158:14-159:13	FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's knowledge is not relevant to claims/unduly prejudicial). 159:4-13: FRE 701 & FRE 401/403 (improper hypothetical/improper lay opinion)	160:12-15	Relevant to showing understanding of phone access issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	161:17-162:7	FRE 602 (witness lacks knowledge regarding topics of questioning); Relevance FRE 401/403 (witness's experience+C728 is not relevant to claims/unduly prejudicial).		Relevant to showing understanding of phone access issues; No basis for undue prejudice objection as testimony is highly relevant to Plaintiffs' claims; Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	173:9-174:10	173:9-19: Hearsay FRE 802 (references document not in evidence for truth of the matter asserted regarding apparent grievance); FRE 602 (witness lacks personal knowledge regarding apparent grievance) Ex 103 - Hearsay.		FRE 802 - not offered for the truth of the matter asserted but to show witness's and defendants' state of mind regarding apparent grievance; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	177:20-178:25	173:9-19: Hearsay FRE 802 (references document not in evidence for truth of the matter asserted regarding apparent grievances); FRE 602 (witness lacks personal knowledge regarding apparent grievances) Ex 103 - Hearsay.		Assume "173:9-19" is just carryover from previous objection. FRE 802 - not offered for the truth of the matter asserted in the grievances but to show witness's and defendants' state of mind regarding apparent grievances; FRE 602 - testimony speaks for itself; Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	186:3-10			
Trinidad, John	6/25/2015	187:10-11			
Trinidad, John	6/25/2015	189:2-6			
Trinidad, John	6/25/2015	191:3-13		190:13-191:2; 192:1-25	
Trinidad, John	6/25/2015	193:3-12	FRE 602, Relevance	190:13-191:2; 210:24-211:12	FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show responses to changes to policies and procedures  210:24-211:12: FRCP 32(a)(6) - Outside of the scope of the designation, lack of foundation, speculation (FRE 602)
Trinidad, John	6/25/2015	196:15-197:20		196:8-14; 197:21-25	

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	200:9-24	FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show responses to changes to policies and procedures
Trinidad, John	6/25/2015	201:19-24			
Trinidad, John	6/25/2015	202:13-204:10	202:13-21 Foundation, FRE 602, Relevance; 203:21-23 Inadmissible hearsay; 204:3-10 Foundation, Calls for speculation, Inadmissible hearsay		Exhibit 106 not offered into evidence; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; relevant to show witness's state of mind as to visitation responsibilities. Hearsay - document not offered for the truth but rather to show defendants' state of mind on receiving such complaints
Trinidad, John	6/25/2015	204:13-205:25	204:13-205:25 Foundation, FRE 602; 205:1-7 Inadmissible hearsay		Business Records Exception; Public Records Exception; offered to show defendants' state of mind as to grievances received; ; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge
Trinidad, John	6/25/2015	208:21-25	FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	209:14-210:9	209:22-25, 210:6-9 FRE 602, Relevance; 210:1-9 Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	210:14-23	FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	211:18-21			
Trinidad, John	6/25/2015	213:8-214:15	214:12-15 Foundation, Assumes facts not in evidence, Calls for speculation		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	216:1-11	FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	216:25-218:19		219:8-13	

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	221:2-222:16	221:14-25 Foundation, FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	222:19-223:20	222:24-223:20 Foundation, FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	225:21-226:19	225:21 - 226:6 Foundation, FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	227:9-24	227:9-16 FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	228:7-12		228:3-6	
Trinidad, John	6/25/2015	231:4-232:4			
Trinidad, John	6/25/2015	233:15-235:8	234:2-18 FRE 602, Calls for speculation		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	235:20-236:3	235:5-8 FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	236:20-238:5	237:9-13 Inadmissible hearsay; 237:22-238:1 FRE 602, Relevance		Business Records Exception; Public Records Exception; not offered for the truth of the matter but to show defendants' state of mind. Witness was clearly familiar with the document or similar documents; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	238:12-19			
Trinidad, John	6/25/2015	239:7-240:6	239:7-17 Foundation, Assumes facts not in evidence, Calls for speculation; 239:25-240:6 Relevance; 240:3-6 FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Trinidad, John	6/25/2015	240:23-242:10	240:23-242:5 Foundation, FRE 602, Calls for speculation; 241:7-11 Inadmissible hearsay		Business Records Exception; Public Records Exception; not offered for the truth of the matter but to show defendants' state of mind. Witness was clearly familiar with the document or similar documents; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	242:13-245:10	242:22-243:2, 243:11-16 Inadmissible hearsay; 243:7-244:4 FRE 602, Relevance; 244:5- 244:21 Foundation, Calls for Speculation; 244:23-245:10 Foundation		Business Records Exception; Public Records Exception; not offered for the truth of the matter but to show defendants' state of mind. Witness was clearly familiar with the document or similar documents; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	248:21-249:15	249:4-15 Inadmissible hearsay, FRE 602, Relevance		Business Records Exception; Public Records Exception; not offered for the truth of the matter but to show defendants' state of mind. Witness was clearly familiar with the document or similar documents; FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	251:9-252:12	FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
Trinidad, John	6/25/2015	257:13-258:4	FRE 602, Relevance		FRE 602 - Witness testified based on personal knowledge; offered to show lack of knowledge; Relevant to show defendants' understanding of phone access
V.V.	7/30/2015	10:12-11:4	Relevance re: 10:12-10:24		Testimony is necessary for completeness (FRE 106).
V.V.	7/30/2015	23:12-21		26:18-27:9; 55:11-56:1	Relevance, unduly prejudicial (FRE 401/403); 55:11-56:1: FRCP 32(a)(6) - Outside of the scope of the designation

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
V.V.	7/30/2015	35:5-7	Relevance - conditions of phones a Dublin prison not at issue	26:18-27:9	<b>RESPONSE TO OBJ.:</b> Offered to show other types of phone access and possible accommodations and alternatives;  Relevance, unduly prejudicial (FRE 401/403), FRCP 32(a)(6) - Outside of the scope of the designation
V.V.	7/30/2015	39:17-40:1		33:9-34:4; 36:15-37:2; 38:18-25; 39:8-16; 41:18-42:21; 43:7-25; 44:18-45:3	
V.V.	7/30/2015	40:10-18			
V.V.	7/30/2015	49:11-18		49:7-10, 49:19-24; 50:4-51:9; 51:17-52:13	
V.V.	7/30/2015	61:11-63:1	Hearsay re: 62:21-63:1	41:18-42:21; 43:7-25; 44:18-45:3; 50:4-51:9; 51:17-52:13; 59:1-61:10	Offered not for the truth but to show V.V.'s state of mind
V.V.	7/30/2015	66:5-14		66:17-67:1	Lack of foundation
V.V.	7/30/2015	82:19-85:2		90:7-22; 113:13-19	
V.V.	7/30/2015	87:5-21		41:8-42:21; 43:7-25; 44:18-45:3; 87:22-24	
V.V.	7/30/2015	92:15-93:14		92:4-14	
V.V.	7/30/2015	95:19-96:10		94:2-95:18	
V.V.	7/30/2015	100:3-7			
V.V.	7/30/2015	101:17-102:3		101:4-16; 113:13-19	
V.V.	7/30/2015	107:2-8		107:9-18	
V.V.	7/30/2015	107:19-108:20			
V.V.	7/30/2015	108:21-110:19		56:19-57:4	FRCP 32(a)(6) - Outside of the scope of the designation
V.V.	7/30/2015	110:20-111:8			
V.V.	7/30/2015	122:11-123:17	Hearsay re: 122:19-21;	56:25-57:4; 123:18-125:22; 157:12-21	Testimony is necessary for completeness (FRE 106), and is not being offered for the truth of the matter asserted. Testimony provides context as to the deponent's admissible answer concerning her personal experience, 123:8-14. Propose 122:11-125:22, which encompasses both. 56:25-57:4: FRCP 32(a)(6) - Outside of the scope of the designation
V.V.	7/30/2015	126:7-19		126:20-127:3	Okay.
V.V.	7/30/2015	128:3-16	Hearsay at 128:6 ("My class members, yes.")	128:17-20	Testimony is necessary for completeness (FRE 106).
V.V.	7/30/2015	139:25-144:21			
V.V.	7/30/2015	154:3-154:18	Hearsay at 154:6-18		Testimony as to witness's observations (154:13-20) is not hearsay; offered to show V.V.'s state of mind; testimony is necessary for completeness (FRE 106).
Vaughn, Michael	2/18/2015	11:5-30:19		137:5-18; 168:2-15	168:2-15: incomplete (FRE 401/403)
Vaughn, Michael	2/18/2015	30:21-31:14		81:11-19; 168:2-15; 168:20-169:1; 218:19-219:14	FRCP 32(a)(6) - Outside of the scope of the designation; 168:2-15: incomplete (FRE 401/403)

**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Vaughn, Michael	2/18/2015	33:14-34:1	33:14-17 Foundation, Assumes facts not in evidence		Witness testified based on personal knowledge; Objections to form of question waived if not raised during deposition
Vaughn, Michael	2/18/2015	39:14-22			
Vaughn, Michael	2/18/2015	39:23-40:14		31:20-32:12	
Vaughn, Michael	2/18/2015	45:24-46:4	45:24-46:4 FRE 602, Relevance		Related to Defendants' efforts to comply with detention standards
Vaughn, Michael	2/18/2015	50:19-51:8	Foundation, Relevance		Witness identifies document; Relevant to establish foundation for document
Vaughn, Michael	2/18/2015	55:5-22	55:5-11 Foundation; 55:5-22 Relevance; 55:13-22 Inadmissible hearsay		Witness testified based on personal knowledge; Related to detainee phone access; Party admission, not hearsay.
Vaughn, Michael	2/18/2015	57:16-59:9	57:16-59:9 Relevance; 58:9-16, 58:23-24, 59:4-6 Inadmissible hearsay, Document speaks for itself		Party admission relevant to show ICE compliance with telephone standards
Vaughn, Michael	2/18/2015	62:22-65:6	62:22-63:5 Foundation, Calls for speculation, Argumentative; 64:22-25 Mistates prior testimony	65:14-18; 66:14-17; 81:11-19; 168:2-15; 168:20-169:1; 218:19-219:14	<b>RESPONSE TO OBJ.:</b> Witness testified based on personal knowledge; Objections to form of question waived if not raised during deposition;  81:11-19; 168:2-15; 168:20-169:1; 218:19-219:14: FRCP 32(a)(6) - Outside of the scope of the designation; 168:2-15: incomplete (FRE 401/403)
Vaughn, Michael	2/18/2015	66:23-67:9	FRE 602, Calls for speculation, Relevance		Witness testifying based on personal knowledge; Objections to form of question waived if not raised during deposition
Vaughn, Michael	2/18/2015	71:15-72:3	Foundation, FRE 602, Assumes facts not in evidence		Witness testified based on personal knowledge
Vaughn, Michael	2/18/2015	72:16-73:4	72:16-22 FRE 602, Relevance; 72:23-73:4 Vague as to time period		Witness testifying based on personal knowledge
Vaughn, Michael	2/18/2015	73:13-74:7	73:13-74:2 Foundation, Vague	137:5-18; 168:2-15	Witness testifying based on personal knowledge 168:2-15: Incomplete designation (FRE 401/403)
Vaughn, Michael	2/18/2015	75:21-76:5	FRE 602, Standards speak for themselves		Witness testifying based on personal knowledge
Vaughn, Michael	2/18/2015	80:17-81:6	FRE 602, Relevance		Witness testifying based on personal knowledge; Related to ICE phone standards
Vaughn, Michael	2/18/2015	83:23-84:1			
Vaughn, Michael	2/18/2015	84:2-5	FRE 602, Relevance		Offered to show lack of knowledge; Related to phone cost and policies
Vaughn, Michael	2/18/2015	86:9-89:14	87:23-25 Hearsay, Document speaks for itself; 89:7-11 Inadmissible hearsay	81:11-19; 168:2-15	Party admission; Business record; Party admission
Vaughn, Michael	2/18/2015	103:5-104:17	104:5-17 Relevance		Related to ICE phone standards
Vaughn, Michael	2/18/2015	105:5-12		137:5-18; 168:2-15	168:2-15: Incomplete designation (FRE 401/403)



**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Vaughn, Michael	2/18/2015	105:13-106:13	106:1-3 FRE 602, Relevance	108:7-10	Witness testifying based on personal knowledge; Related to phone system
Vaughn, Michael	2/18/2015	107:13-20	107:18-20 FRE 602, Relevance	108:7-10	Witness testifying based on personal knowledge; Related to ICE phone policies and practices
Vaughn, Michael	2/18/2015	112:6-23	112:6-8, 112:19-23 FRE 602, Relevance		Witness testifying based on personal knowledge; Related to phone cost
Vaughn, Michael	2/18/2015	115:7-11			
Vaughn, Michael	2/18/2015	116:13-15			
Vaughn, Michael	2/18/2015	117:3-119:2	117:3-24 Relevance		Related to ICE phone policies and practices
Vaughn, Michael	2/18/2015	122:19-21	122:19-21 FRE 602, Relevance		Witness testifying based on personal knowledge; Related to ICE phone policies and practices
Vaughn, Michael	2/18/2015	122:22-25	122:22-123:15 FRE 602, Relevance		Witness testifying based on personal knowledge; Related to ICE phone policies and practices
Vaughn, Michael	2/18/2015	123:1-15			
Vaughn, Michael	2/18/2015	129:24-130:14			
Vaughn, Michael	2/18/2015	131:1-10	130:3-131:20 Outside the scope of witness's testimony as R. 30(b)(6) witness, Hearsay, Relevance; 131:16-17 Inadmissible hearsay		Testimony outside of scope of 30(b)(6) permissible under N.D. Cal law; Party admission; Related to ICE phone standards; Offered to prove potential phone options, not for truth of the matter asserted
Vaughn, Michael	2/18/2015	131:11-132:1			
Vaughn, Michael	2/18/2015	142:22-143:20			
Vaughn, Michael	2/18/2015	145:3-20			
Vaughn, Michael	2/18/2015	155:3-22	Relevance		Related to detainee phone access and ICE phone standards
Vaughn, Michael	2/18/2015	157:21-158:2	157:21-24 Foundation, Calls for facts not in evidence		Witness testifying based on personal knowledge; Objections to form of question waived if not raised during deposition
Vaughn, Michael	2/18/2015	160:1-17	160:1-17 Relevance; 160:4-6 Inadmissible hearsay		Related to phone cost and ICE phone capabilities; Party admission
Vaughn, Michael	2/18/2015	173:11-16	FRE 602, Relevance	84:9-18; 84:25-85:8; 173:22-174:4	<b>RESPONSE TO OBJ.:</b> Witness testifying based on personal knowledge; Related to phone cost and detainee phone access; 84:9-18, 84:25-85:8: FRCP 32(a)(6) - Outside of the scope of the designation; 84:9-18, 84:25-85:8, 173:22-174:4: Incomplete designation (FRE 401/403)
Vaughn, Michael	2/18/2015	183:1-184:3	183:1-184:3 Relevance; 183:1-9 Mistates prior testimony		Related to ICE phone standards; Witness testifying based on personal knowledge
Vaughn, Michael	2/18/2015	184:11-20	Relevance		Related to ICE phone standards
Vaughn, Michael	2/18/2015	186:23-188:20	Relevance		Related to ICE phone standards



**APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations**

Witness Name	Date of Deposition	Plaintiff Page:Line Affirmative Designations	Defendants' Objections	Defendants' Page:Line Counter Designations	Plaintiffs' Responses to Defendants' Objections and/or Counter-Designations
Vaughn, Michael	2/18/2015	193:3-196:2	193:3-196:2 Outside the scope of witness's testimony as R. 30(b)(6) witness, Outside the relevant time period, Hearsay, Relevance, Foundation, Document speaks for itself; 194:18-195:3 Foundation, Assumes facts not in evidence; 194:25-196:2 FRE 602		Testimony outside of scope of 30(b)(6) permissible under N.D. Cal law; Party admission; Related to ICE phone standards; Offered to prove potential phone options, not for truth of the matter asserted; Witness testifying based on personal knowledge
Vaughn, Michael	2/18/2015	197:23-198:13			
Vaughn, Michael	2/18/2015	198:23-201:1			
Vaughn, Michael	2/18/2015	202:4-203:13	202:4-14 Foundation, Assumes facts not in evidence	203:14-17; 177:18-23; 178:3-12	<b>RESPONSE TO OBJ.:</b> Witness testifying based on personal knowledge; 177:18-23: speculation; lack of personal knowledge (FRE 602); 178:3-13: incomplete designation (FRE 401/403)
Vaughn, Michael	2/18/2015	206:15-21	Foundation, Calls for speculation		Witness testifying based on personal knowledge; Objections to form of question waived if not raised during deposition
Vaughn, Michael	2/18/2015	207:18-208:12	208:11-12 Relevance; 208:23-209:2 FRE 602, Relevance		Related to access to phones at facilities
Vaughn, Michael	2/18/2015	208:14-209:2			
Vaughn, Michael	2/18/2015	211:6-212:17			
Vaughn, Michael	2/18/2015	213:15-214:19	Scope, Relevance, FRE 602, Calls for speculation		Testimony outside of scope of 30(b)(6) permissible under N.D. Cal law; Related to phone access; Witness testifying based on personal knowledge; Objections to form of question waived if not raised during deposition
Vaughn, Michael	2/18/2015	217:5-217:18	Relevance		Related to ICE phone standards and detainee phone access

APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Astorga-Cervantes, Jose	2/13/2015	6:1-2				
Astorga-Cervantes, Jose	2/13/2015	15:14–16:1				
Astorga-Cervantes, Jose	2/13/2015	16:5-6				
Astorga-Cervantes, Jose	2/13/2015	16:25–18:15				
Astorga-Cervantes, Jose	2/13/2015	18:19–19:24				
Astorga-Cervantes, Jose	2/13/2015	21:16–22:17				
Astorga-Cervantes, Jose	2/13/2015	24:13–25:1				
Astorga-Cervantes, Jose	2/13/2015	30:6-19				
Astorga-Cervantes, Jose	2/13/2015	40:6–43:4				
Astorga-Cervantes, Jose	2/13/2015	48:10-19				
Astorga-Cervantes, Jose	2/13/2015	68:8-18	FRE 106	67:18-68:7; 68:19-23	<p><b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation.</p> <p><b>Objection (as to 68:19-23):</b> FRE 801/802 hearsay, counter-designated testimony has no bearing on whether Plaintiff was able to make free calls, does not correct or complete context of testimony, and thus does not fall within the scope of FRE 106 or FRCP 32(a)(6).</p>	
Astorga-Cervantes, Jose	2/13/2015	79:16-18				
Astorga-Cervantes, Jose	2/13/2015	87:24–88:5				
Gonzalez, Eric	8/19/2015	7:25–8:4				
Gonzalez, Eric	8/19/2015	17:4-17				
Gonzalez, Eric	8/19/2015	239:23–240:4 & Ex. 218				
Gonzalez, Eric	8/19/2015	240:12–243:12 & Ex. 218	FRE 106	240:12-243:22 & Ex. 218	<p><b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation.</p>	
Gonzalez, Eric	8/19/2015	245:23(beginning with “This is”)–247:7 & Ex. 219	FRE 106	245:23-247:14 & Ex. 219	<p><b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation.</p>	
Lyon, Jr., Audley Barrington	2/11/2015	5:12-23				
Lyon, Jr., Audley Barrington	2/11/2015	27:17(beginning with “in your”)-20				
Lyon, Jr., Audley Barrington	2/11/2015	35:17-22				

APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Lyon, Jr., Audley Barrington	2/11/2015	37:3-20	FRE 106	38:6-39:14	<p><b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation.</p> <p><b>Objection:</b> FRE 801/802 hearsay, because counter-designated testimony has no relationship to what Mr. Lyon reported to immigration judge regarding inability to find counsel, does not correct or complete context of testimony, and does not fall within the scope of FRE 106 or FRCP 32(a)(6).</p>	
Lyon, Jr., Audley Barrington	2/11/2015	55:5-56:5 & Ex. 36				
Lyon, Jr., Audley Barrington	2/11/2015	56:23-58:19	<p>FRE 106</p> <p>FRE 403 Misleading/ Confusion of issues</p> <p>FRE 602 Foundation</p>	55:19-22; 111:15-112:1	<p><b>Response:</b> Plaintiff's receipt of document that looked like detainee handbook highly probative of notice to detainees.</p> <p><b>Objection (as to 55:19-22):</b> FRE 403 needlessly cumulative, already designated.</p> <p><b>Objection (as to 111:22-12:1):</b> FRE 801/802 hearsay, counter-designated testimony has no relationship to what Mr. Lyon received in terms of the ICE detainee national handbook, does not correct or complete context of testimony, and thus does not fall within the scope of FRE 106 or FRCP 32(a)(6).</p>	

APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Lyon, Jr., Audley Barrington	2/11/2015	58:24–59:12	FRE 106 FRE 403 Misleading/ Confusion of issues FRE 602 Foundation	55:19-22; 111:112:1 [Defts' Note: assumed to be 111:15-112:1]	<b>Response:</b> Plaintiff's receipt of document that looked like detainee handbook highly probative of notice to detainees. <b>Objection (as to 55:19-22):</b> FRE 403 needlessly cumulative, already designated. <b>Objection (as to 111:22-12:1):</b> FRE 801/802 hearsay, counter-designated testimony has no relationship to what Mr. Lyon received in terms of the ICE detainee national handbook, does not correct or complete context of testimony, and thus does not fall within the scope of FRE 106 or FRCP 32(a)(6).	
Lyon, Jr., Audley Barrington	2/11/2015	59:15-17		111:15-112:19		
Lyon, Jr., Audley Barrington	2/11/2015	60:2-5	FRE 106 FRE 403 Misleading/ Vague	60:6-13; 65:2-67:8	<b>Response:</b> Any objection to form of question for vagueness has been waived as not asserted at deposition; Plaintiff's perception of lack of restrictions on use of phones is highly probative of telephone access. <b>Objection (as to 60:6-13):</b> counter- designated testimony does not relate to "current" restrictions, does not correct or complete context of testimony, and thus does not fall within scope of FRE 106 or FRCP 32(a)(6); FRE 403 vague as objected to by counsel; FRE 403 incomplete designation, misleading/unduly prejudicial. <b>Objection (as to 65:2-67:8):</b> FRE 403 incomplete designation/misleading.	(as to 60:6-13): 60:19-61:2; (as to 65:2-67:8): 62:24-63:3; 67:9-12.
Lyon, Jr., Audley Barrington	2/11/2015	60:19-22				
Lyon, Jr., Audley Barrington	2/11/2015	60:24–61:2				

APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Lyon, Jr., Audley Barrington	2/11/2015	63:6–64:22	FRE 106	66:14-24	<b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation. <b>Objection:</b> FRE 403 incomplete designation, misleading/unduly prejudicial.	62:24-63:3; 67:9-12
Lyon, Jr., Audley Barrington	2/11/2015	65:20–66:1 (ending at “No.”)				
Lyon, Jr., Audley Barrington	2/11/2015	71:8-21				
Lyon, Jr., Audley Barrington	2/11/2015	73:8(beginning with “I think you”)-15				
Lyon, Jr., Audley Barrington	2/11/2015	73:17-23				
Lyon, Jr., Audley Barrington	2/11/2015	75:15-21				
Lyon, Jr., Audley Barrington	2/11/2015	84:12(beginning with “So beginning in”)-15				
Lyon, Jr., Audley Barrington	2/11/2015	84:17-23				
Lyon, Jr., Audley Barrington	2/11/2015	94:2-5				
Lyon, Jr., Audley Barrington	2/11/2015	94:13-14				
Lyon, Jr., Audley Barrington	2/11/2015	94:18				
Lyon, Jr., Audley Barrington	2/11/2015	94:20–95:23				
Lyon, Jr., Audley Barrington	2/11/2015	96:6-9				
Lyon, Jr., Audley Barrington	2/11/2015	98:11-14				
Neria-Garcia, Nancy	11/10/2015	6:23–7:3				
Neria-Garcia, Nancy	11/10/2015	7:21–8:10				
Neria-Garcia, Nancy	11/10/2015	8:13-25				
Neria-Garcia, Nancy	11/10/2015	18:25–19:1	FRE 402/403 Relevance/ Prejudice		<b>Response:</b> Testimony is probative of several relevant facts; relates to alternate causation/lack of causation/lack of risk of erroneous deprivation because Plaintiff's prior re-entries show limited availability of relief and flight risk; relates to security risks due to characteristics of detainee population, which includes those who have illegally re-entered country and have administratively final removal orders and present flight risks. Testimony also admissible as to attack of credibility under FRE 607, 608.	

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Neria-Garcia, Nancy	11/10/2015	19:4–20:6	FRE 402/403 Relevance/ Prejudice		<b>Response:</b> Testimony is probative of several relevant facts; relates to alternate causation/lack of causation/ lack of risk of erroneous deprivation because Plaintiff's prior re-entries show limited availability of relief and flight risk; relates to security risks due to characteristics of detainee population, which includes those who have illegally re-entered country and have administratively final removal orders and present flight risks. Testimony also admissible as to attack of credibility under FRE 607, 608.	
Neria-Garcia, Nancy	11/10/2015	20:8-21	FRE 402/403 Relevance/ Prejudice		<b>Response:</b> Testimony is probative of several relevant facts; relates to alternate causation/lack of causation/ lack of risk of erroneous deprivation because Plaintiff's prior re-entries show limited availability of relief and flight risk; relates to security risks due to characteristics of detainee population, which includes those who have illegally re-entered country and have administratively final removal orders and present flight risks. Testimony also admissible as to attack of credibility under FRE 607, 608.	
Neria-Garcia, Nancy	11/10/2015	24:13(beginning with "So")-20				
Neria-Garcia, Nancy	11/10/2015	26:6–27:6				
Neria-Garcia, Nancy	11/10/2015	28:8-15				

APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Neria-Garcia, Nancy	11/10/2015	33:23–34:7	FRE 106	34:8-9, 18-24; 35:9-36:8	<b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation. <b>Objection:</b> FRE 401/403, confusion of the issues/unduly prejudicial, counter-designated testimony (in contrast to designated testimony, which clearly asks about speed dials) does not apparently relate to pro bono platform speed dials; incomplete designation; FRE 602, witness lacks knowledge as to why her telephone calls did not connect.	(if objection to counter overruled): 36:19-25
Neria-Garcia, Nancy	11/10/2015	38:21-23	FRE 106	34:8-9, 18-24; 35:9-36:8	<b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation. <b>Objection:</b> FRE 401/403, confusion of the issues/unduly prejudicial, counter-designated testimony (in contrast to designated testimony, which clearly asks about speed dials) does not apparently relate to pro bono platform speed dials; incomplete designation; FRE 602, witness lacks knowledge as to why her telephone calls did not connect.	(if objection to counter overruled): 36:19-25
Neria-Garcia, Nancy	11/10/2015	67:4-8				
Neria-Garcia, Nancy	11/10/2015	81:12(beginning with “do you”)- 20	FRE 106	83:7-11	<b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation.	

APPENDIX 4: Amended Deposition Designations, Objections  
and Counter Designations

Witness Name	Date of Deposition	Defendants' Page:Line Affirmative Designations	Plaintiffs' Objections	Plaintiffs' Page:Line Counter Designations	Defendants' Responses to Plaintiffs' Objections and/or Counter-Designations	Defendants' Page:Line Counter Designations
Neria-Garcia, Nancy	11/10/2015	82:2(beginning with "Do you")-4	FRE 106	83:12-14	<b>Response:</b> This does not appear to be an objection to the text, but a justification for counter-designation.	
Neria-Garcia, Nancy	11/10/2015	82:7-8				
Neria-Garcia, Nancy	11/10/2015	82:25-83:6				
Neria-Garcia, Nancy	11/10/2015	84:19-25				
Neria-Garcia, Nancy	11/10/2015	85:14-22				
Neria-Garcia, Nancy	11/10/2015	86:10-12				
Neria-Garcia, Nancy	11/10/2015	92:18(beginning with "do you")-21				
Neria-Garcia, Nancy	11/10/2015	93:9-13				
Neria-Garcia, Nancy	11/10/2015	94:7-9				
Neria-Garcia, Nancy	11/10/2015	97:1-8				
Neria-Garcia, Nancy	11/10/2015	97:20(beginning with "Do you")-25				
Neria-Garcia, Nancy	11/10/2015	98:6(beginning with "Do you")-9				
Neria-Garcia, Nancy	11/10/2015	115:8-21				
Neria-Garcia, Nancy	11/10/2015	116:5-15				
Neria-Garcia, Nancy	11/10/2015	116:23-117:3				
Neria-Garcia, Nancy	11/10/2015	117:4-11				
Neria-Garcia, Nancy	11/10/2015	120:11(beginning with "while you")-15				
Neria-Garcia, Nancy	11/10/2015	125:6-126:1				
Neria-Garcia, Nancy	11/10/2015	126:3-9				
Neria-Garcia, Nancy	11/10/2015	133:8(beginning with "While at")-12				
Neria-Garcia, Nancy	11/10/2015	133:16-25				
Neria-Garcia, Nancy	11/10/2015	139:18-20				
Neria-Garcia, Nancy	11/10/2015	141:13-18				
Neria-Garcia, Nancy	11/10/2015	143:18-20				
Neria-Garcia, Nancy	11/10/2015	145:12(beginning with "How many")-20				
Neria-Garcia, Nancy	11/10/2015	162:6-11 & Ex. 242				
Neria-Garcia, Nancy	11/10/2015	162:15-163:3 & Ex. 242				
Neria-Garcia, Nancy	11/10/2015	163:19-164:9 & Ex. 242				